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Response dated 12/01/2006
Reply to Office Action of 09/01/2006

REMARKS

In the above-identified Office Action, the Examiner rejected Claims 1, 3 – 10, 23 and 25 – 32 under 35 U.S.C. §101 as being directed to non-statutory subject matter. Claims 1, 3 – 10, 12, 14 – 21, 23, 25 – 32, 34 and 36 – 43 and 45 were rejected under 35 U.S.C. §102(a) as being anticipated by DeStefano.

Applicants have amended independent Claims 1, 12, 23 and 34 to overcome the 101 rejection made thereto. Specifically, applicants have amended the independent claims to show that the claimed invention does provide a useful, concrete and tangible result (i.e., displaying a Web document with all embedded links highlighted).

In regard to Claims 23 and 25 - 32, the Examiner stated that they recite "an apparatus" in the preamble only, the body of the claims merely contains software components. However, it should be pointed out that the means recited in the claims are the software components executed by one or more processors (i.e., depending on implementation, any or all of processors 202, 204 and 302 of Figs. 2 and 3) since software components by themselves cannot accomplish their tasks. Therefore, the body of the claims does not merely contain software components since the means plus functions include the processor(s).

Applicants submit that the claims now provide a useful, concrete and tangible result and as such fall under 35 U.S.C. §101. Consequently, Applicants respectfully request the withdrawal of the 101 rejection.

Due to the changes to the independent claims, Claims 3 – 9, 14 – 20, 25 – 31 and 36 – 42 were amended. Thus by this amendment, Claims 1, 3 – 10, 12, 14 – 21, 23, 25 – 32, 34, 36 – 43 and 45 remain pending. For the reasons stated more fully below, Applicants submit that the claims are allowable over the applied reference. Hence, reconsideration, allowance and passage to issue are respectfully requested.

The present application was appealed on December 22, 2005. In Response to the Appeal, the Examiner re-opened prosecution by issuing the AUS920010875US1

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present 102 rejection. To support the rejection, the Examiner utilized one of the references that were originally used to finally reject the claim. Applicants respectfully disagree with the rejection.

DeStefano teaches a method of presenting information from a body of knowledge to a user. According to DeStefano, information from a body of knowledge is maintained in one or more information elements, at least a portion of which is associated with one or more named concepts that may be related to one another in any number of logically-relevant ways (e.g., being similar to or different from one another, being members of a common set or group, etc.). Links are defined between two or more of such named concepts so that information elements associated with named concepts linked together may be visually represented to a user in such a manner that the logical relationship between such named concepts is apparent to the user.

For example, a reference work on the subject of energy may be categorized as a body of knowledge. A number of named concepts from such a body of knowledge may be defined. For example, the named concepts may include energy and heat. Within such named concepts, there may be concept identifiers such as "energy", "newton_energy", "newton_work", "einstein_energy", "einstein_mass", "energy_sources", "fire", "heat", "energy_chemical", "energy_solar", "energy_geothermal", "gravity", and "cold". Synonym-type links may be defined such that when a user is exploring a certain aspect of the body of knowledge "newton_energy" and "einstein_energy" may be displayed as being synonymous to "energy". Likewise, when the user is exploring another aspect of the body of knowledge, synonym-type links may be defined to show that "fire", "energy_solar" and "energy_geothernal" are synonymous to "heat".

In such instances (i.e., when the user is exploring the particular aspect of the body of knowledge), the proper links will be activated. Consequently, when the user crosses over one named identifier with a pointer, the other named identifier(s) will be highlighted to show their logical relationship. That is, when the user crosses over named concept identifier "newton_energy" with a pointer,

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for instance, named concept identifier "einstein_energy" will be highlighted, and vice versa, to show that the two terms are synonymous in this particular aspect of the body of knowledge. Likewise, when the crosses over any one of named concept identifiers "energy_solar", "energy_geothermal" and "fire" with the pointer, the named concept identifiers that are not being crossed over with the pointer will be highlighted to show that in the present aspect of the body of knowledge the identifiers are synonymous.

Therefore, the links are selectively enabled in response to predetermined criteria (e.g., the aspect that the user is exploring). Hence, different links may be enabled or disabled under appropriate circumstances.

However, DeStefano does not teach the steps of *enabling a user to issue a command to have the plurality of links embedded in the Web document to be highlighted*; and *upon receiving the command, displaying the Web document with all the plurality of embedded links highlighted* as shown in the reproduced, Claim 1 below.

In the Response to Arguments Section of the Office Action as well as in the support of the rejection Section, the Examiner stated that in col. 3, lines 23 – 36 and associated text to Fig. 7, DeStefano teaches highlighting links that are not easily identifiable in a displayed Web document upon user command. Applicants disagree.

In col. 3, lines 23 – 36, it is stated that "[l]inks are typically selectively enabled in response to a predetermined criteria so that different links may be enabled or disabled under appropriate circumstances. For example, a link may be selectively enabled in response to the sensitivity of one of the named concepts for the information elements to being crossed over by a pointer, or in response to a specified highlight enablement status of one of the referenced concepts. A link may also be enabled based upon the highlight enablement status of a link type associated with the link, or of a particular level of abstraction associated with the link. It should be appreciated that the aforementioned criteria

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for enabling a link are not exclusive, and that other criteria will be apparent to one of ordinary skill in the art."

But note that in the passage reproduced above there is no reference to highlighting links that are not easily identifiable in a displayed Web document. More importantly, there is no reference to highlighting **all** links in the document upon user command.

The associated text to Fig. 7 is in col. 18, line 67 to col. 19, line 23. There it is stated that "[a] scrollable list of concept ID's is displayed in a left panel of the dialog box, with each concept ID having associated therewith a crossover sensitive switch 92 and a highlight enabled switch 94. Each crossover sensitive switch 92 may be toggled on or off to gate whether link pointer highlighting is enabled when the pointer passes over an information element associated with a given concept ID. Each highlight enabled switch 94, on the other hand, gates whether an information element having a given concept ID that is referenced by a concept ID tag for the crossed-over information element is to be highlighted.

A second scrollable list of link types is provided in a center panel of the dialog box to permit highlighting of each defined link type to be enabled or disabled by an associated switch 96. A third scrollable list of level identifiers is provided in a right panel of the dialog box to permit level-restricted highlighting of concept ID's to be enabled or disabled by an associated switch 98. By failing to select that a restriction for a particular level is to be enforced, any reference level identifier for a referenced concept that specifies the level is ignored in determining whether to enable highlighting. In the alternative, highlighting of each level of abstraction may be selectively enabled or disabled, rather than restricted, by using appropriate switches."

Thus, the associated text to Fig. 7 explains how the links are made to be selectively enabled in response to predetermined criteria so that different links may be enabled or disabled under appropriate circumstances.

However, in those passages it is not stated that when the links are not easily identifiable they can be highlighted upon user command. Consequently

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Applicants submit that Claim 1, reproduce below, and its dependent claims are allowable over the applied reference. The other independent claims (i.e., Claims 12, 23 and 34) which all include the emboldened-italicized limitations in the below-reproduced Claim 1, including their dependent claims, should be allowable as well. Hence, Applicants once more respectfully request reconsideration, allowance and passage to issue of the claims in the application.

> 1. A method of making links that are not easily identified in a displayed Web document by a user to be clearly recognizable comprising the steps of:
> displaying the Web document, the Web document having a plurality of embedded links;
> *enabling the user to issue a command to have the plurality of links embedded in the Web document to be highlighted;*
> receiving the command upon issuance; and
> *upon receiving the command, displaying the Web document with all the plurality of embedded links highlighted.* (Emphasis added.)

Respectfully Submitted

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